# IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

(Electronically Filed)

MILDRED BALDWIN and : DOUGLAS DYRSSEN SR., : On Behalf of Themselves and All Others : Similarly Situated, :

:

Plaintiffs, :

.

v. : Case No, 2:21-cv-04066-WJE

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NATIONAL WESTERN LIFE INSURANCE COMPANY,

:

Defendant.

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### PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS

Plaintiffs Mildred Baldwin and Douglas Dyrssen, Sr., individually and behalf of others similarly situated ("Plaintiffs") hereby move this Court to:

- 1. Approve an award of attorneys' fees and costs in the amount of \$1,314,900; and
- 2. Approve service awards for the two class representatives in the amount of \$3,000 each, or \$6,000 in aggregate.

In support of this Motion, Plaintiffs refer this Honorable Court to A) their Suggestions in Support, filed contemporaneously with this motion; B) the records, pleadings, and papers filed in this action, and; C) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the Final Approval Hearing currently scheduled for June 16, 2022.

Wherefore, premises considered, Plaintiffs request that this Court grant this motion and the relief sought herein as part of the Final Approval Order entered in this case.

#### Respectfully submitted,

### /s/David K. Lietz

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## **CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing by electronic mail to the attorneys and parties of record.

/s/David K. Lietz
David K. Lietz